

Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

DIANNE H. PAPPAS
Chief Executive Officer
District Operations and Digital Innovation

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Director (Acting), Environmental Health and Safety

NOTICE OF EXEMPTION

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LOS ANGELES, COUNTY CLERK

To:
County Clerk and Registrar-Recorder
County of Los Angeles
12400 Imperial Highway
Norwalk, CA 90650

From:
LAUSD OEHS
333 S. Beaudry Avenue
21st Floor
Los Angeles, CA 90017

Project Title:

Americans with Disabilities Act (ADA) Compliance Projects at forty-three LAUSD Campuses (Phase II, Groups 1-5)

Project Location -- Specific:

- 135th Street ES - 801 W 135th St. Gardena, CA 90247
- 153rd Street ES - 1605 W 153rd St. Gardena, CA 90247
- 68th Street ES - 612 W 68th St. Los Angeles, CA 90044
- 75th Street ES - 142 W 75th St. Los Angeles, CA 90003
- Academy of Enriched Sciences - 17551 Miranda St. Encino, CA 91316
- Ambler ES - 319 E Sherman Dr. Carson, CA 90746
- Anatola ES - 7364 Anatola Ave. Van Nuys, CA 91406
- Annandale ES - 6125 Poppy Peak Dr. Los Angeles, CA 90042
- Avalon Gardens ES - 13940 S San Pedro St. Los Angeles, CA 90061
- Blythe ES - 18730 Blythe St. Reseda, CA 91335
- Bonita ES - 21929 Bonita St. Carson, CA 90745
- Broadous ES - 12561 Filmore St. Pacoima, CA 91331
- Chandler ES - 14030 Weddington St. Sherman Oaks, CA 91401
- Coldwater Canyon ES - 6850 Coldwater Canyon Ave. North Hollywood, CA 91605
- Dana MS - 1501 S Cabrillo Ave. San Pedro, CA 90731
- Edison MS - 6500 Hooper Ave. Los Angeles, CA 90001
- Erwin ES - 13400 Erwin St. Van Nuys, CA 91401
- Farmdale ES - 2660 Ruth Swiggett Dr. Los Angeles, CA 90032

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

*The Office of Environmental Health and Safety is dedicated to providing a safe and healthy environment
for the students and employees of the Los Angeles Unified School District.*

Los Angeles Unified School District

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- Glenwood ES - 8001 Ledge Ave. Sun Valley, CA 91352
- Grand View ES - 3951 Grand View Blvd. Los Angeles, CA 90066
- Griffith MS - 4765 E 4th St. Los Angeles, CA 90022
- Haddon ES - 10115 Haddon Ave. Pacoima, CA 91331
- Harbor City ES - 1508 W 254th St. Harbor City, CA 90710
- Independence ES - 8435 Victoria Ave. South Gate, CA 90280
- Kennedy ES - 4010 E Ramboz Dr. Los Angeles, CA 90063
- Los Angeles Academy of Arts and Enterprise - 1200 W Colton St. Los Angeles, CA 90026
- La Salle Avenue ES - 8715 La Salle Ave. Los Angeles, CA 90047
- Lane ES - 1500 Avenida Cesar Chavez Monterey Park, CA 91754
- Lawrence MS - 10100 Variel Ave. Chatsworth, CA 91311
- Manhattan PI ES - 1850 W 96th St. Los Angeles, CA 90047
- Marianna ES - 4215 E Gleason St. Los Angeles, CA 90063
- Northridge MS - 17960 Chase St. Northridge, CA 91325
- O'Melveny ES - 728 Woodworth St. San Fernando, CA 91340
- Pio Pico MS - 1512 S Arlington Ave. Los Angeles, CA 90019
- President ES - 1465 W 243rd St. Harbor City, CA 90710
- Short ES - 12814 Maxella Ave. Los Angeles, CA 90066
- Sunland ES - 8350 Hillrose St. Sunland, CA 91040
- Sutter MS - 7330 Winnetka Ave. Winnetka, CA 91306
- Taper ES - 1824 Taper Ave. San Pedro, CA 90731
- Union ES - 150 S Burlington Ave. Los Angeles, CA 90057
- Vinedale ES - 10150 La Tuna Canyon Rd. Sun Valley, CA 91352
- White MS - 2401 Wilshire Blvd. Los Angeles, CA 90057
- Wilson HS - 4500 Multnomah St. Los Angeles, CA 90032

Project Location – City:

Various (see above)

Project Location – County:

Los Angeles

Los Angeles Unified School District

Office of Environmental Health and Safety

Description of Nature, Purpose, and Beneficiaries of Project:

The scope of the project includes Americans with Disabilities Act (ADA) compliance improvements at forty-three Los Angeles Unified School District (LAUSD) school campuses: 135th Street Elementary School, 153rd Street Elementary School, 68th Street Elementary School, 75th Street Elementary School, Academy of Enriched Sciences, Ambler Elementary, Anatola Elementary School, Annandale Elementary School, Avalon Gardens Elementary School, Blythe Street Elementary School, Bonita Street Elementary School, Hillery T. Broadous Elementary School, Chandler Learning Academy, Coldwater Canyon Elementary School, Richard Henry Dana Middle School, Thomas A Edison Middle School, Erwin Elementary School, Farmdale Elementary School, Glenwood Elementary School, Grand View Boulevard Elementary School, Griffith Middle School, Haddon Avenue Elementary School, Harbor City Elementary School, Independence Elementary School, Robert F Kennedy Elementary School, Los Angeles Academy of Arts and Enterprise, La Salle Avenue Elementary School, Robert Hill Lane Elementary School, Ernest Lawrence Middle School, Manhattan Place Elementary School, Marianna Avenue Elementary School, Northridge Middle School, O'Melveny Elementary School, Pio Pico Middle School, President Avenue Elementary School, Short Avenue Elementary School, Sunland Elementary School, John A Sutter Middle School, Taper Avenue Elementary School, Union Avenue Elementary School, Vinedale Elementary School, Charles White Middle School, and Woodrow Wilson High School (Campuses) (Project). These ADA compliance improvements are legal requirements mandated by the Division of State Architect (DSA) and may include one or more of the following: Path of Travel (POT) upgrades and the removal of barriers; upgrades to existing restrooms to improve accessibility and installation of ADA compliant fixtures; installation of ADA compliant ramps; installation of platform lifts; modifications to arcades; installation of ADA compliant drinking fountains and sinks; installation of accessible gates, doors, thresholds, and/or hardware; modifications to cafeteria counters; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-striping; assembly seating modifications; modifications to locker rooms, nurse's examination rooms, and dressing rooms; accessible furniture installation or upgrades; modifications to playground components; modifications to railings; installation of assistive listening devices, intercoms, and/or phones; modification to existing elevators; and installation of new elevators. The table below summarizes the various ADA compliance improvements that would occur at each school.

Los Angeles Unified School District

Office of Environmental Health and Safety

Summary of Proposed ADA Compliance Improvements at Each School

School	Path of Travel Upgrades and Barrier Removal	ADA Restroom Upgrades	ADA Compliant Ramps	Platform Lifts Installation	Arcade Modification	ADA Compliant Drinking Fountains and Sinks	Accessible Gates, Doors, Thresholds, &/or Hardware	Cafeteria Counter Modification	ADA Compliant Signage	Accessible Parking Stalls/ Loading Zones	Assembly Seats Modifications	Locker Room, Nurse's Exam Room, Dressing Room Modifications	Accessible Furniture Installation or Upgrades	Playground Components Modification	Railings Modification	Assistive Listening Devices/Intercom/Phones	Existing Elevator Modification	New Elevator
135th Street ES	X	X	X			X	X		X		X		X		X			
153rd St ES	X	X	X		X	X	X		X		X		X		X			
68th Street ES	X	X				X	X		X		X		X		X	X		
75th Street ES	X	X	X			X	X		X				X	X	X			
Academy of Enriched Sciences	X	X				X	X		X				X		X			
Ambler ES	X	X				X	X		X		X		X	X	X	X		
Anatola ES	X	X				X	X		X				X		X			
Annandale ES	X	X				X	X		X				X		X	X		
Avalon ES	X	X	X		X	X	X		X	X		X	X	X	X			
Blythe ES	X	X				X	X	X	X	X	X	X				X	X	
Bonita ES	X	X				X	X		X		X		X		X			
Broadous ES	X	X	X			X	X	X	X	X	X	X				X		
Chandler ES	X	X				X	X		X				X		X			
Coldwater Canyon ES	X	X				X	X		X				X		X			
Dana MS	X	X	X			X	X	X	X		X		X		X	X	X	
Edison MS	X	X	X			X	X	X	X	X		X		X	X	X	X	
Erwin ES	X	X	X			X	X	X	X		X		X		X	X		
Farmdale ES	X	X				X	X		X	X	X		X		X	X		
Glenwood ES	X	X	X			X	X	X	X	X			X		X	X		
Grand View ES	X	X	X	X		X	X		X	X	X	X	X	X	X	X		
Griffith MS	X	X	X		X	X	X		X				X		X			
Haddon ES	X	X				X	X	X	X	X	X				X			

Los Angeles Unified School District

Office of Environmental Health and Safety

School	Path of Travel Upgrades and Barrier Removal	ADA Restroom Upgrades	ADA Compliant Ramps	Platform Lifts Installation	Arcade Modification	ADA Compliant Drinking Fountains and Sinks	Accessible Gates, Doors, Thresholds, &/or Hardware	Cafeteria Counter Modification	ADA Compliant Signage	Accessible Parking Stalls / Loading Zones	Assembly Seats Modifications	Locker Room, Nurse's Exam Room, Dressing Room Modifications	Accessible Furniture Installation or Upgrades	Playground Components Modification	Railings Modification	Assistive Listening Devices / Intercom / Phones	Existing Elevator Modification	New Elevator
Harbor City ES	X	X				X	X		X		X		X		X	X		
Independence ES	X	X				X	X		X				X		X	X		
Kennedy ES	X	X	X			X	X		X				X		X			
LA Acad MS	X	X	X	X		X	X		X		X	X	X		X	X		
La Salle ES	X	X				X	X		X		X		X					
Lane ES	X	X	X			X	X	X	X	X		X			X	X		
Lawrence MS	X	X				X	X	X	X	X	X	X			X	X		
Manhattan PI ES	X	X	X			X	X		X		X		X		X	X		
Marianna ES	X	X				X	X		X		X		X		X	X		
Northridge MS	X	X	X	X		X	X		X	X		X			X	X		
O'Melveny ES	X	X				X	X	X	X		X		X		X	X		X
Pio Pico MS	X	X		X		X	X		X	X		X			X		X	
President ES	X	X				X	X		X		X		X		X	X		
Short ES	X	X				X	X		X		X		X		X	X		
Sunland ES	X	X				X	X		X		X		X		X	X		
Sutter MS	X	X				X	X		X				X		X	X		
Taper ES	X	X	X			X	X		X		X		X		X	X		X
Union ES	X	X	X			X	X		X	X			X		X		X	
Vinedale ES	X	X	X			X	X		X				X	X	X			
White MS	X	X	X	X		X	X	X	X	X	X		X		X	X		
Wilson HS	X	X	X			X	X	X	X	X	X	X	X		X	X	X	

Los Angeles Unified School District

Office of Environmental Health and Safety

The Project will be constructed per DSA approved plans. The Project will be implemented per all applicable local and State regulations, as well as all District Standards and Specifications; such as those provided in LAUSD's Program Environmental Impact Report for the School Upgrade Program.¹ The primary purpose of the Project is to comply with current ADA access requirements. The Project would not cause an increase in student capacity or enrollment and would not result in an increase in the intensity of use. The beneficiaries of the Project include students and staff at each of the respective schools and the community at large who may request access to the facilities and grounds of the Campuses pursuant to the Civic Center Act (CA Ed. Code Sections 38130 - 38139).

Name of Public Agency Approving the Project:

Los Angeles Unified School District

Name of Person or Agency Carrying Out Project:

Los Angeles Unified School District

Exempt Status: (check one below)

- Ministerial [Public Resources Code (PRC) Section 21080(b)(1); CEQA Guidelines Section 15268²]:
- Declared Emergency [PRC Section 21080(b)(3); CEQA Guidelines Section 15269(a)]:
- Emergency Project [PRC Section 21080(b)(4); CEQA Guidelines Section 15269(b)(c)]:
- Categorical Exemption (PRC Section 21084; CEQA Guidelines Sections 15300 -15333):
 - *CEQA Guidelines Section 15301 – Existing Facilities*
 - *CEQA Guidelines Section 15302 – Replacement or Reconstruction*
 - *CEQA Guidelines Section 15303 – New Construction or Conversion of Small Structures*
 - *CEQA Guidelines Section 15311 – Accessory Structures*
- Statutory Exemption:

¹ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

² CEQA Guidelines can be found at California Code of Regulations Title 14, Chapter 3, Section 15000 - Section 15387.

Los Angeles Unified School District

Office of Environmental Health and Safety

Reasons why project is exempt:

Section 15301 Existing Facilities

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.

The Project entails ADA compliance improvements at forty-three LAUSD Campuses. Such improvements may include, but are not limited to, POT upgrades and the removal of barriers; upgrades to existing restrooms to improve accessibility and installation of ADA compliant fixtures; installation of ADA compliant ramps; installation of platform lifts; modifications to arcades; installation of ADA compliant drinking fountains and sinks; installation of accessible gates, doors, thresholds, and/or hardware; modifications to cafeteria counters; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-stripping; assembly seating modifications; modifications to locker rooms, nurse's examination rooms, and dressing rooms; accessible furniture installation or upgrades; modifications to playground components; modifications to railings; installation of assistive listening devices, intercoms, and/or phones; modification to existing elevators; and installation of new elevators.

All of the proposed Project components would involve minor alterations to existing public structures and would occur within the area occupied by existing facilities at the Project sites. The Project components would not present a new or expanded use of the Project sites. Therefore, the Project constitutes minor alterations to existing school sites that result in no expansion of use and meets the requirements of CEQA Guidelines Section 15301.

Section 15302 Replacement or Reconstruction

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

The Project includes upgrades or replacement of existing structures and facilities, such as POT upgrades; upgrades to existing restrooms to improve accessibility and installation of ADA compliant fixtures; installation of ADA compliant ramps; modifications to arcades; installation of ADA compliant drinking fountains and sinks; installation of accessible gates, doors, thresholds, and/or hardware; modifications to cafeteria counters; creation of accessible parking stalls and loading zones through re-stripping; assembly seating modifications; modifications to locker rooms, nurse's examination rooms, and dressing rooms; accessible furniture installation or upgrades; modifications to playground components; modifications to railings; and modification to existing elevators. The Project would not change the location or the purpose of the structures and facilities being replaced and will not expand the capacity of the Campuses. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15302.

Section 15303 New Construction or Conversion of Small Structures

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made to the structure.

The Project includes the construction and location of small new structures, such as the installation of ADA compliant fixtures; installation of ADA compliant ramps; installation of platform lifts; installation of ADA compliant drinking fountains and sinks; installation of accessible gates, doors, thresholds, and/or hardware; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-stripping; accessible furniture installation; and installation of new elevators. The Project also includes the installation of small new equipment, such as the installation of assistive listening devices, intercoms, and/or phones. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15303.

Los Angeles Unified School District

Office of Environmental Health and Safety

Section 15311 Accessory Structures

Class 11 consists of construction or replacement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities, including, but not limited to, on premise signs and small parking lots.

The Project includes the construction or replacement of minor structures accessory to existing institutional facilities, including POT upgrades and the removal of barriers; installation of ADA compliant ramps; installation of platform lifts; installation of accessible gates; installation of ADA compliant signage; creation of accessible parking stalls and loading zones through re-striping; modifications to playground components; modifications to railings; modification to existing elevators; and installation of new elevators.. Therefore, the Project satisfies the requirements of CEQA Guidelines Section 15311.

Section 15300.2 – Exceptions

Section 15300.2 of the CEQA Guidelines, Exceptions, provides conditions under which categorical exemptions are inapplicable. Review of the Project indicates that they would not violate any of the exceptions, as described below.

1. *The project would occur in certain specified sensitive environments or locations;*

The Project sites are fully developed Campuses within urbanized communities.³ None of the Project sites have been designated as biologically sensitive locations. The nearest sensitive environment to the Project sites is a Critical Habitat area for the Santa Ana Sucker (*Catostomus santaanae*), located approximately 0.55 mile northwest of Sunland ES.⁴ As such, the Project will not impact sensitive environments or locations.

2. *Cumulative impacts would be considerable because successive projects of the same type would occur at the same place over time;*

As the Campuses are active school sites, there will likely be ongoing maintenance activities and minor projects on the Campuses to keep the schools operational. As the Project would not result in any lasting impacts once construction of the Project is complete, the Project would not contribute to cumulative impacts when considered with expected successive projects.

3. *There is a reasonable possibility that the activity would have a significant effect on the environment due to unusual circumstances.*

There are no known unusual circumstances that would have a significant effect on the environment. The removal of trees is not anticipated as part of the proposed scope of work. However, should the Project be altered to include the removal of trees, LAUSD's Office of Environmental Health & Safety (OEHS) must be notified immediately. District policy requires consultation with an arborist to determine if the trees are a protected native species. Additionally, written approval from the school principal will be required before any trees can be removed. If tree removal is scheduled to occur between February 1 and August 31, a nesting bird survey would be performed prior to removal activities, per standard condition (SC) of approval SC-BIO-3 of the Program Environmental Impact Report for the School Upgrade Program (Program EIR).⁶

The Project may include minor ground-disturbing activities. These activities are not considered unusual circumstances for the classes of projects under which an exemption is claimed. Nevertheless, consideration must be given to the management of pavement removal and excavated soils associated with earthwork activities for the Project. As the Project

³ City of Los Angeles Planning Department, *Zoning and Information Management System*, <http://zimas.lacity.org/>, accessed May 2018.

⁴ United States Fish and Wildlife Service Critical Habitat Portal, <https://ecos.fws.gov/ecp/report/table/critical-habitat.html> accessed May 2018.

⁵ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed May 2018.

⁶ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

Los Angeles Unified School District

Office of Environmental Health and Safety

involves the removal of pavement, soil sampling and testing for characterization is required prior to demolition and removal of the paving materials. Excavated soils will only be reused onsite if they are placed beneath paved areas.

If construction or earthmoving activities require import or export of soils and materials, OEHS must be notified to provide oversight to ensure that these activities are conducted in compliance with the requirements of District Specification 01 4524, relevant provisions of South Coast Air Quality Management District Rule 1466, and other applicable environmental agency rules and requirements.⁷ The proposed Project includes construction of an occupied space (e.g., an elevator) at Taper Avenue ES, which is located within a methane buffer zone. Therefore, LAUSD will comply with local requirements for construction of occupied spaces within a methane buffer zone. Furthermore, as set forth in SC-CUL-13, SC-CUL-15, SC-CUL-18, and SC-CUL-19 of the Program EIR, construction activities must be stopped immediately and OEHS notified upon discovery of subsurface features, such as buried resources (i.e., paleontological resources, archaeological resources), tanks or seepage pits or stained/odoriferous soils.⁸ Lastly, any construction and demolition waste shall be recycled to the maximum extent feasible per SC-USS-1 of the Program EIR.⁹ Therefore, the Project would not have a significant effect on the environment due to unusual circumstances.

4. *The project may result in damage to scenic resources, including but not limited to trees, historic buildings, rock outcroppings, or similar resources within a highway officially designated as a scenic highway;*

The closest designated scenic highway to any of the Project sites is State Route 2 (SR2), which is located approximately 1.5 miles north of Sunland ES.¹⁰ In addition, the Project would not result in the removal of historic buildings, rock outcroppings, or other scenic resources. Therefore, the Project would not result in damage to scenic resources or similar resources within a highway officially designated as a state scenic highway.

5. *The project is located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code; or*

None of the Projects are located on sites that are included on any list compiled pursuant to Section 65962.5 of the Government Code.¹¹ Therefore, the Project would have no impacts related to being located on a hazardous waste site.

6. *The project may cause a substantial adverse change in the significance of a historic resource.*

LAUSD determined that these forty-three Campuses are ineligible as historic resources.^{12, 13} Therefore, the Project would have no impact to a historic resource.

⁷ LAUSD OEHS, "Section 01 4524 Environmental Import/Export Materials Testing", http://www.laschools.org/documents/file?file_id=219798234&show_all_versions_p=t

⁸ LAUSD OEHS, "School Upgrade Program Final Environmental Impact Report," <http://achieve.lausd.net/ceqa>, Adopted by the Board of Education on November 10, 2015.

⁹ *Ibid.*

¹⁰ Los Angeles County Department of Regional Planning, http://gis.planning.lacounty.gov/GIS-NET3_Public/Viewer.html, accessed May 2018.

¹¹ http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm, accessed May 2018.

¹² Chattel, Inc., "Eligibility Written Descriptions," March 30, 2018.

¹³ LAUSD. 2018. Historic Resources Inventory. Los Angeles, CA.

Los Angeles Unified School District

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Signed by:



Carlos Torres,
CEQA Officer of the Los Angeles Unified School District (Acting)

Date:



Dean C. Logan
Los Angeles County Registrar / Recorder
12400 Imperial Highway, Norwalk, CA
(800)201-8999

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Total		\$75.00

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